

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NIPPONKOA INSURANCE CO. LTD,  
U.S. BRANCH

*Plaintiff,*

- against -

NORFOLK SOUTHERN RAILWAY COMPANY

*Defendant.*

**ECF CASE**

**08 CIV. 1302**

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, John W. Hoeftling, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name: Jeffrey D. Cohen, Esquire  
Firm Name: Keenan Cohen & Howard P.C.  
Address: One Pitcairn Place, Suite 2400, 165 Township Line Road  
City/State/Zip: Jenkintown, PA 19046  
Telephone: (212) 609-1110  
Facsimile: (212) 609-1117  
Email: jcohen@freightlaw.net

Jeffrey D. Cohen is a member in good standing of the Bar of the State(s) of Pennsylvania.

Pennsylvania Bar #: 77798.

FILED  
U.S. DISTRICT COURT  
2008 APR -9 PM 1:48  
S.D. NEW YORK

APR 09 2008

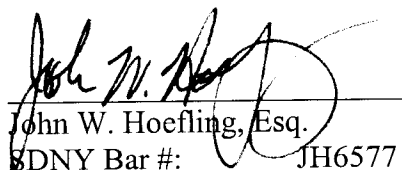
\$25-

1040982

There are no pending disciplinary proceedings against Jeffrey D. Cohen in any State or Federal court.

Dated: April 9, 2008  
Mineola, New York

Respectfully submitted,



John W. Hoefling, Esq.

SDNY Bar #: JH6577  
Firm Name: Kelly, Rode & Kelly, LLP  
Address: 330 Old County Road  
Suite 305  
City: Mineola  
State: New York  
Zip Code: 11501  
Phone Number: (516) 739-0400  
Fax Number: (516) 739-0434  
Our File No.: JWH 100900-655

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NIPPONKOA INSURANCE CO. LTD,  
U.S. BRANCH

*Plaintiff,*

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**AFFIDAVIT OF JOHN W.  
HOEFLING IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

State of New York     )  
                                  )     ss:  
County of Nassau     )

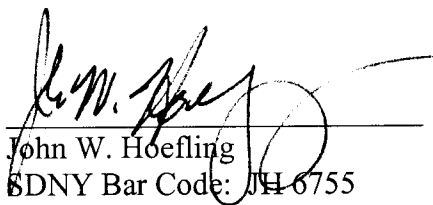
John W. Hoeftling, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Defendant Norfolk Southern Railway Company in the above captioned case. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the Defendant's motion to admit Jeffrey D. Cohen as counsel *pro hac vice* to represent Defendant Norfolk Southern Railway Co. in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1978. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this Court.
3. I have known Jeffrey D. Cohen since 2006.

4. Mr. Cohen is a partner in the firm of Keenan Cohen & Howard P.C., Jenkintown, Pennsylvania.
5. I have found Mr. Cohen to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
6. Accordingly, I am pleased to move the admission of Jeffrey D. Cohen *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Jeffrey D. Cohen *pro hac vice*, which is attached hereto as Exhibit A.

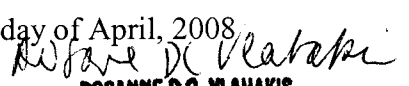
**WHEREFORE**, it is respectfully requested that the motion to admit Jeffrey D. Cohen *pro hac vice* to represent Defendant Norfolk Southern Railway Company in the above-captioned matter be granted.

Dated: April 9, 2008  
Mineola, New York

  
John W. Hoefling  
SDNY Bar Code: JH 6755

Sworn to before me this

9<sup>th</sup> day of April, 2008

  
ROSANNE D.C. VLAHAKIS  
NOTARY PUBLIC, State of New York  
No. 30-4609260  
Qualified in Nassau County  
Commission Expires 3/31/2011





Supreme Court of Pennsylvania

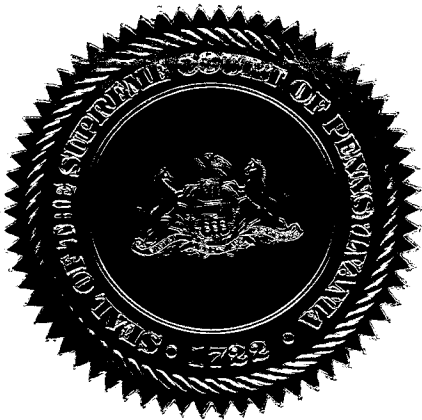
**CERTIFICATE OF GOOD STANDING**

***Jeffrey D. Cohen, Esq.***

**DATE OF ADMISSION**

***June 20, 1996***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: April 7, 2008**

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson  
Chief Clerk

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NIPPONKOA INSURANCE CO. LTD,  
U.S. BRANCH

*Plaintiff,*

- against -

NORFOLK SOUTHERN RAILWAY COMPANY

*Defendant.*

**ECF CASE**

**08 CIV. 1302**

**ORDER FOR ADMISSION  
PRO HAC VICE ON  
WRITTEN MOTION**

Upon the motion of Shawn P. Kelly, attorney for Defendant Norfolk Southern Railway Company and said sponsor attorney's affidavit in support:

**IT IS HEREBY ORDERED** that

Applicant's Name: Jeffrey D. Cohen, Esquire  
Firm Name: Keenan Cohen & Howard P.C.  
Address: One Pitcairn Place, Suite 2400, 165 Township Line Road  
City/State/Zip: Jenkintown, PA 19046  
Telephone: (212) 609-1110  
Facsimile: (212) 609-1117  
Email: jcohen@freightlaw.net

Is admitted to practice *pro hac vice* as counsel for Defendants in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nyds.uscourts.gov](http://nyds.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: April , 2008  
New York, New York

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United States District Judge

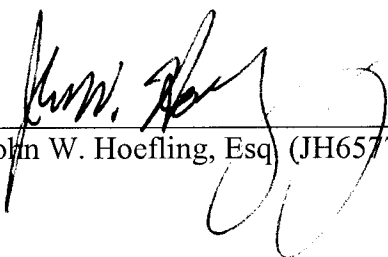
**CERTIFICATE OF SERVICE**

I, the undersigned counsel, hereby certify that on April 9, 2008, a true and correct copy of the foregoing Motion for Pro Hac Vice Admission was filed with the Court and served upon the following parties via first class mail, postage pre-paid:

David T. Maloof, Esquire  
Thomas M. Eagan, Esquire  
MALOOF BROWN & EAGAN, LLC  
411 Theodore Fremd Avenue, Suite 190  
Rye, NY 10580-1411

*Attorneys for Plaintiff  
Nipponkoa Insurance Company Ltd.*

By:

  
\_\_\_\_\_  
John W. Hoefling, Esq (JH6577)